

# **Exhibit A**

PAUL RACHMUTH, LAW OFFICE  
265 SUNRISE HIGHWAY, STE. 1515  
ROCKVILLE CENTRE, NEW YORK 11570  
TELEPHONE: (516) 330-0170 FACSIMILE: (516) 543-0516 PAUL@PARESQ.COM

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October 9, 2024

Via Email: dan@vedralaw.com

Daniel Vedra, Esq.  
Vedra Law LLC  
1444 Blake Street  
Denver, CO 80202

Re: Floyd's of Leadville, Inc. n/k/a Valued, Inc. v Alexander Capital L.P. - 22CV03318

Dear Daniel:

I am attaching an August 13, 2024 police report and Complaint Information Form and Certification in Support of Probable Cause by Frank Squilla ("Complaint"). According to the Complaint, Vice President of Sales & Operations for Plaintiff Floyd's of Leadville, Inc. n/k/a Valued, Inc. ("Plaintiff"), Bob Bell, intimidated and threatened bodily harm to a potential witness by telephone. Equally concerning, I understand that Mr. Bell also communicated threats intended to be communicated to my client, Mark Leonard.

Frank Squilla, at times a business associate of Mr. Leonard, was listed on Mr. Leonard's initial disclosures as a potential witness as well as a potential witness on Plaintiff's initial disclosures. Mr. Squilla certified that Mr. Bell screamed that he was "coming for" Mr. Squilla, would beat Mr. Squilla to a pulp and kill him. I have been informed that Mr. Bell said that he was going to do the "same thing to Mark Leonard."

I am obviously concerned about an agent of Plaintiff threatening a potential witness and my client, Mark Leonard. Of added concern is the apparent time of the call. The police report indicates that Mr. Bell made these threats at 1:00 PM Eastern time on August 13. On August 13, from 9:06 AM until 7:12 PM Eastern, you conducted the remote deposition of Jonathan Gazdak. I believe Mr. Bell attended that deposition with you in your office.

Please respond expeditiously with any relevant facts and any steps you are taking to ensure that the actions threatened in the Complaint do not occur, the harassment comes to an end and no further threats, such as those described in the Complaint, are made in the future.

Sincerely,



Paul A. Rachmuth

Encl.

P667-2024  
8/15

Christine Ciallella, RMC  
Township Clerk  
cciallella@twp.washington.nj.us  
856-589-0520 ext. 214

**OPEN PUBLIC RECORDS ACT REQUEST FORM**  
**TOWNSHIP OF WASHINGTON**  
**523 EGG HARBOR ROAD**  
**SEWELL, NJ 08080**

Barbara Moore  
Deputy Clerk  
bmoore@twp.washington.nj.us  
856-589-0520 ext. 213

**WE DO NOT ACCEPT FAXES.**  
**PLEASE EMAIL, MAIL OR DELIVER IN PERSON ONLY!**

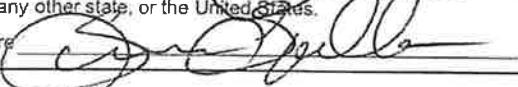
**Important Notice**

The last page of this form contains important information related to your rights concerning government records. Please read it carefully.

**Requestor Information – Please Print**

First Name Francis MI A Last Name Squilla  
E-mail Address FRANK.SQUILLA@COMCAST.NET  
Mailing Address 41 CAVESSON TRAIL  
City Sewell State NJ Zip 08080  
Telephone 609 220 9979 FAX N/A  
Preferred Delivery: Pick Up  US Mail  On-Site  Inspect  Fax  E-mail

If you are requesting records containing personal information, please circle one: Under penalty of N.J.S.A. 2C:28-3, I certify that I HAVE HAVE NOT been convicted of any indictable offense under the laws of New Jersey, any other state, or the United States.

Signature 

Date 8/15/24

**Payment Information**

Maximum Authorization Cost \$

Select Payment Method

Cash  Check  Money Order

Fees: Letter size pages - \$0.05 per page  
Legal size pages - \$0.07 per page

Other materials (CD, DVD, etc) – actual cost of material

Delivery: Delivery / postage fees additional depending upon delivery type.

Extras: Special service charge dependent upon request.

**Record Request Information:** Please be as specific as possible in describing the records being requested. Also, please note that your preferred method of delivery will only be accommodated if the custodian has the technological means and the integrity of the records will not be jeopardized by such method of delivery.

Property Address \_\_\_\_\_

Records Requested CASE # 24-38212  
IT IS THE REPORT I file w/ office Diskfan

**AGENCY USE ONLY**

Est. Document Cost \_\_\_\_\_  
Est. Delivery Cost \_\_\_\_\_  
Est. Extras Cost \_\_\_\_\_  
Total Est. Cost \_\_\_\_\_  
Deposit Amount \_\_\_\_\_  
Estimated Balance \_\_\_\_\_  
Deposit Date \_\_\_\_\_

**AGENCY USE ONLY**

**Disposition Notes**  
Custodian: If any part of request cannot be delivered in seven business days, detail reasons here.

In Progress	-	Open	_____
Denied	-	Closed	_____
Filled	-	Closed	_____
Partial	-	Closed	_____

**AGENCY USE ONLY**

Tracking Information	Final Cost
Tracking # _____	Total _____
Rec'd Date _____	Deposit _____
Ready Date _____	Balance Due _____
Total Pages _____	Balance Paid _____

Records Provided

Custodian Signature \_\_\_\_\_

Date \_\_\_\_\_

	<b>Washington Police Department</b>			<b>Incident Report</b>		
	Incident: <b>4-HARASSMENT</b>					
	Incident Report Number: <b>24-038212</b>	Between: Date - Time		And/At: Date-Time <b>8/13/24</b>	16:20	
	Incident Location: <b>1 McClure DR, Sewell Washington, NJ, 08080</b>					
	Offense - 1: <b>2C:33-4</b>	Offense - 2:	Offense - 3:	Offense - 4:		
	Offense - 5:	Offense - 6:	Offense - 7:	Offense - 8:		
	<b>V</b>	Name ( <i>Last, First, Middle</i> ) <b>Squilla, Frank</b>		DOB: [REDACTED]	Race/Sex W/	
	Address: ( <i>Address, City, State, Zip</i> ) [REDACTED]			Phone 1 [REDACTED]		
	Employer			Phone 2		
	Employer Address			Work Phone #		
	Name ( <i>Last, First, Middle</i> )		DOB:	Race/Sex		
Address: ( <i>Address, City, State, Zip</i> )			Phone 1			
Employer			Phone 2			
Employer Address			Work Phone #			
<b>NARRATIVE</b>						
<p><b>Origin:</b> On 08/13/2024 at approximately 1620 hours I, (Ofc. DeStefano #10-214), was dispatched to a non-emergency call for service at 1 McClure Drive for a reported Harassment.</p> <p><b>Arrival:</b> Upon my arrival I met with the victim, Frank A. Squilla</p> <p><b>Interview of Victim:</b> The victim, Frank Squilla, explained that on 08/13/2024 he received a call from Robert Bell. Squilla further explained that Bell and his business partner Floyd Landis are involved in litigation with business associates of his. Bell contacted Squilla due to him being in possession of over 200 emails with his name on it. Bell stated that Squilla is "a piece of shit" and subsequently advised that "when he sees him, he will give him the biggest beating of his life." Bell also explained that he would find Squilla and kill him. Out of fear, Squilla mentioned to Bell that the phone call is being recorded. Bell responded by explaining that he was not advised of this nor given permission for</p>						
Vehicle Information: ( <i>Year, Make, Model, Style, Color</i> )						
License Number:	State:	Expiration Year:	Vin:	Insurance Company:		
Other Vehicle Information:					NCIC#	
Reporting Officer(s): <b>DeStefano, Louis A.</b>				Payroll Number: <b>LD10214</b>	Report Date: <b>08/17/2024</b>	
Time Received: <b>16:20:54</b>	Time Cleared: <b>16:49:34</b>	Unit(s) Assigned: <b>P10214</b>		Pages:		
Reviewed by: <b>Conti, Michael P.</b>		Payroll Number: <b>MCR103</b>		Copy To		

Date:

08/17/2024

Offense - 1:

2C:33-4

Incident Report Number:

24-038212

**Washington Police Department****Continuation**

Incident Report Number 24-038212	Incident Location: 1 McClure DR, Sewell Washington, NJ, 08080	Incident Date: 08/13/2024
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the call to be recorded.

**Interview of Witness:** N/A**Interview Accused:** N/A

**Investigation:** I took a report to document the incident. Squilla received a phone call from Bell in regard to being in possession of Squilla's emails. In regard to the emails, Bell had begun threatening him over the phone and stated he would find Squilla and kill him. Squilla advised Bell he was being recorded, in which Bell further advised that he did not have Squilla's permission. I advised Squilla of the process to endorse criminal complaints at the Washington Township Court Office. Squilla completed a written statement (see attached). No further investigation from this officer.

Reporting Officer(s): DeStefano, Louis A.	Payroll Number: LD10214	Pages: 2 of 3
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**Washington Police Department****Continuation**

Incident Report Number 24-038212	Incident Location: 1 McClure DR, Sewell Washington, NJ, 08080	Incident Date: 08/13/2024
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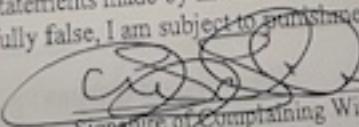
**NAMES****Suspect**

Bell, Robert W/ of [REDACTED]

Phone 1: [REDACTED]

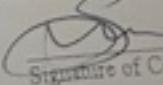
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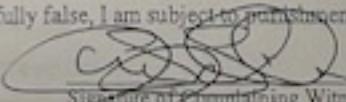
Reporting Officer(s): DeStefano, Louis A.	Payroll Number: LD10214	Pages: 3 of 3
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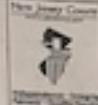
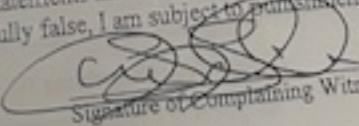
New Jersey Judiciary Municipal Court of New Jersey			
Certification in Support of Probable Cause			
State of New Jersey		Municipal Court Name	County of
		WASH TWP	Gloucester
Court Address		City	Zip
3 McCleary		SEWELL	08050
Date of Incident	Location of Incident	Municipality	
8/13/24	WASH TWP 5ths via phone	WASH TWP	
I offer the following facts and information to establish probable cause in this complaint against (Defendant's name) <u>ROBERT "BOB" Bell</u> , whom I would like to charge with (list Statutes or Ordinances):  <del>2C 28-5a</del> <u>2C 28-5a Witness Tampering</u>			
How do you know the identity of the person you are charging?  <u>Business Associates</u>			
Describe the incident in detail:  8/13/24 1PM I received a phone call while at 5ths Wawa in response to ongoing litigation of which I am a witness. Today there were depositions in NYC, which I did not participate. The call I received was from Robert "Bob" Bell, where he went on about his lawyer Tirade screaming at the top of his lungs that he was coming for me, would beat me to a pulp & kill me. He was unhinged. I am an investor in his company & he told me as well that the \$25K investment is forfeited. I also have that in writing. This is the end of all calls. I do not want this man or any of			
Certification: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.			
8/15/24 Date	 Signature of Complainant Print Name		

Complaint Information Form			
<p><b>New Jersey Judiciary Municipal Court of New Jersey</b></p> 			
<p>Instructions: Please complete the following information to the best of your ability. This information will help in the preparation of the complaint.</p>			
<p>Your Name (You are the complainant)</p> <p><b>FRANCIS A Squilla</b></p>		<p>City</p>	<p>State Zip</p>
<p>Street Address</p> <p><b>4 CAVESSON TRAIL</b></p>		<p>NT 08080</p>	
<p>Telephone Number</p> <p><b>609 220 9979</b></p>		<p>Email Address</p> <p><b>Frank.Squilla@comcast.net</b></p>	
<p>Defendant's Name</p> <p><b>ROBERT "BOB" BELL</b></p>		<p>City</p> <p><b>DENVER</b></p>	
<p>Street Address</p> <p><b>180 FAIRFAX ST</b></p>		<p>State Zip</p> <p><b>CO 80220</b></p>	
<p>Telephone Number (if known)</p> <p><b>201 248 7517</b></p>		<p>Date of Birth (if known)</p> <p><b>7 7</b></p>	
<p>Driver's License (if known)</p>			
<p>Is the person you are charging an elected public official or a candidate for elected public office?          If yes, provide any information regarding what elected office the person is a candidate for or currently holds.</p>			
<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>			
<p>If this is a motor vehicle complaint, list:</p>			
<p>Licence Plate # of Other Vehicle</p>		<p>State Description of vehicle (if known)</p>	
<p>Names and addresses of witnesses (use additional paper if necessary)</p>			
<p>Name</p> <hr/> <hr/> <hr/> <hr/>		<p>Address</p> <hr/> <hr/> <hr/> <hr/>	
<p style="text-align: center;"><u>For Court Use Only</u></p>			
<p>Court Administrator/Deputy Initials</p> <hr/>		<p>Date:</p> <hr/>	
<p>Corresponding Complaint Numbers:</p> <hr/>			
<p>(Every request requires the filing of a complaint.)</p>			

 New Jersey Judiciary Municipal Court of New Jersey <b>Confidential Domestic Violence Complaint Information Form</b> <i>(Not to be Disclosed)</i>					
Instructions: Please complete the following information to the best of your ability. This information will help in the preparation of the complaint.					
Your Name (you are the complainant) <b>Francis A Sguilla</b>					
Street Address <b>4 CAVESON TRAIL</b>	City <b>SEWELL</b>	State <b>NJ</b>	Zip <b>08060</b>		
Telephone Number <b>609 220 9979</b>	Email Address <b>frank.sguilla@comcast.net</b>				
Defendant's Name <b>ROBERT BOB "BELL</b>					
Street Address <b>180 Fairfax St.</b>	City <b>DENVER</b>	State <b>CO</b>	Zip <b>80220</b>		
Telephone Number (if known) <b>301 248 7517</b>	Date of Birth (if known)	What is your relationship to the defendant? <b>Business Associate</b>			
Is the person you are charging an elected public official or a candidate for elected public office? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, provide any information regarding what elected office the person is a candidate for or currently holds					
When did the offense occur? <b>9/13/24</b>	Where did the offense occur? <b>on a Phone Call while At Work</b>				
Is there a domestic violence restraining order in effect? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
In which county was the restraining order obtained? What is the effective date of the restraining order?					
Names and addresses of witnesses (use additional paper if necessary)					
Name _____ Address _____ _____ _____ _____ _____					
<u><b>For Court Use Only</b></u>					
Court Administrator/Deputy Initials: _____			Date: _____		
Corresponding Complaint Numbers: _____					
(Every request requires the filing of a complaint.)					

		New Jersey Judiciary Municipal Court of New Jersey <b>Certification in Support of Probable Cause</b>		
State of New Jersey      Municipal Court Name <b>Washington Twp</b>		County of <b>Gloucester</b> 		
Court Address <b>3 McCCLURE DR</b>		City <b>Sewell</b>	Zip <b>08080</b>	
Date of Incident <b>8/13/24</b>	Location of Incident <b>WAWA 5 PTS VIA PINE</b>	Municipality <b>WASH TWP</b>		
<p>I offer the following facts and information to establish probable cause in this complaint against          (Defendant's name) <b>ROBERT "BOB" BELL</b> whom I would like to charge with (List Statute          or Ordinance(s)) <b>TERRORE</b> He <b>VERBALLY Threatened to BEAT ME TO A RIP</b>  <del>cheats, <b>cheats,</b></del> <b>AND KILL ME. I AM A WITNESS</b>  <b>Business Associate</b> <b>in Litigation Case with him</b></p> <p>How do you know the identity of the person you are charging?</p> <p><b>Business Associates</b></p> <p>Describe the incident in detail.</p> <p>8/13/24 1PM BOB Bell Called me while I WAS AT          WAWA. CALLED ME A PIECE OF SHIT &amp; THAT WAS          coming for me &amp; would BEAT ME &amp; KILL ME. This is          in Response to A FAKE Business Relationship I          am not involved in the Litigation, But listed AS          a witness for The other side. I also DISCOVERED          into Plays Landis's CBS Company, custom Bob is          the COO. During this call as well as in memo          he states The SHARES we purchased have officially          been FORFEITED. I GUESS now THAT is ALSO THEFT          of 125K and defrauds. HE WAS UNFINGERED &amp; SCARY.</p> <p>Certification: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.</p> <p><u>9/15/24</u>          Date</p> <p>          Signature of Complainant Witness          Print Name</p>				

	New Jersey Judiciary Municipal Court of New Jersey			
Certification in Support of Probable Cause				
State of New Jersey		Municipal Court Name	County of	
		Wash Twp	Gloucester	
Court Address		City	Zip	
3 McCleay		Sewell	08080	
Date of Incident	Location of Incident	Municipality		
8/13/24	Within 50ts via Pitone	Wash Twp		
<p>I offer the following facts and information to establish probable cause in this complaint against (Defendant's name) <u>ROBERT "Bob" Bell</u>, whom I would like to charge with (list Statutes or Ordinances):</p> <p><u>2C 33-4. A Threatening</u></p>				
<p>How do you know the identity of the person you are charging?</p> <p><u>Business Associates</u></p> <p>Describe the incident in detail:</p> <p>8/13/24 1PM I Received A Pitone CALL while AT 50ts      WAWA In Response to ongoing litigation of which I      Am A witness. Today There were Depositions in NYC, which      I did NOT Partic. pat. The CALL I Received was from      ROBERT "Bob" Bell, where he went on A Profanity Laces      TIRING screaming at the top of His lungs that it was      coming for me, would beat me to a pulp &amp; kill me. He was      unlitigious. I AM AN INVESTOR in his company &amp; he took an      AS WELL THAT THE 125K investment is safeties. I ALSO      HAVE THAT in writing this is the end of the calls. I      NOT want this man or any of</p>				
<p>Certification: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.</p> <p><u>8/15/24</u>      Date</p> <p>      Signature of Complainant Witness      Print Name</p>				

	New Jersey Judiciary Municipal Court of New Jersey		
Certification in Support of Probable Cause			
State of New Jersey		Municipal Court Name <u>WASH TWP</u>	County of <u>Gloucester</u>
Court Address <u>3 McCloskey</u>	City <u>SEWELL</u>	ZIP <u>08080</u>	Municipality
Date of Incident <u>8/13/24</u>	Location of Incident <u>WHAT 5A's via phone</u>	Municipality <u>WASH TWP</u>	
<p>I offer the following facts and information to establish probable cause in this complaint against (Defendant's name) <u>Robert "Bob" Bell</u>, whom I would like to charge with (list Statutes or Ordinances):</p> <p><u>2C:35-1A</u> <u>2C 28-5 WITNESS TAMPERING</u></p>			
<p>How do you know the identity of the person you are charging?</p> <p><u>Business Associates</u></p> <p>Describe the incident in detail:</p> <p>8/13/24 1PM I Received A Phone Call while AT 5A's WHAT In Response to ongoing litigation of which I Am A witness. Today There were Depositions in NYC, which I did not Participate. The CALL I Received WAS from ROBERT "BOB" Bell, where he went on Alacrity Laces TIRADE Screaming At The Top of His lungs THAT IT WAS coming for Me, would BEAT Me to A pulp &amp; Kill Me. He was unwilling. I AM An Investor in his company &amp; he told me As well THAT The \$25K investment is forfeited. I also HAVE THAT IN writing. This is The end of ALL CALLS. I DO NOT want THIS man or any of</p>			
<p>Certification: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.</p> <p><u>8/15/24</u> Date</p> <p> Signature of Complainant Witness</p> <p>Print Name</p>			

 New Jersey Judiciary Municipal Court of New Jersey <b>Confidential Domestic Violence Complaint Information Form</b> (Not to be Disclosed)					
Instructions: Please complete the following information to the best of your ability. This information will help in the preparation of the complaint.					
Your Name (you are the complainant) <b>Francis A Sguilla</b>					
Street Address <b>4 CAVESSON TRAIL</b>	City <b>SEWELL</b>	State <b>NJ</b>	Zip <b>08860</b>		
Telephone Number <b>609 220 9979</b>	Email Address <b>FrankSguilla@comcast.net</b>				
Defendant's Name <b>ROBERT BOB "BELL"</b>					
Street Address <b>1800 Fairfax St.</b>	City <b>Denver</b>	State <b>CO</b>	Zip <b>80220</b>		
Telephone Number (if known) <b>301 248 7517</b>	Date of Birth (if known)	What is your relationship to the defendant? <b>Business Associate</b>			
Is the person you are charging an elected public official or a candidate for elected public office? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, provide any information regarding what elected office the person is a candidate for or currently holds.					
When did the offense occur? <b>8/13/24</b>	Where did the offense occur? <b>on a phone call while at work</b>				
Is there a domestic violence restraining order in effect? In which county was the restraining order obtained? What is the effective date of the restraining order?					
Names and addresses of witnesses (use additional paper if necessary)					
Name <hr/> <hr/> <hr/> <hr/>		Address <hr/> <hr/> <hr/> <hr/>			
<u><b>For Court Use Only</b></u>					
Court Administrator/Deputy Initials: _____			Date: _____		
Corresponding Complaint Numbers: (Every request requires the filing of a complaint.)					